



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096
HELENA, MONTANA 59626-0096

Ref: 8MO

April 13, 1998

Mr. Thomas Clifford
Forest Supervisor
Helena National Forest
2880 Skyway Drive
Helena, Montana 59601

Re: Poorman Project Final
Environmental Impact Statement
and Record of Decision

Dear Mr. Clifford:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency, Region VIII, Montana Office (EPA) has reviewed the above-referenced Final Environmental Impact Statement (FEIS) and Record of Decision (ROD).

The EPA is supportive of the purpose of the proposed Poorman Project to maintain healthy sustainable ecosystems that reduce fire risk, provide wildlife habitat, protect soil and water, provide recreation, and provide wood for people's use. The EPA does not object to the selected alternative to treat 567 acres by regeneration harvest, 577 acres by commercial and precommercial thinning, and 5,920 acres by prescribed fire. We are pleased that stream stabilization and sediment mitigation/reduction actions and establishment of Riparian Habitat Conservation Areas are included in the proposed project.

We note that it will be important to avoid sediment increases, since Poorman Creek is listed as a Water Quality Limited Stream Segment in need of development of a Total Maximum Daily Load (TMDL) plan. We are pleased that the FEIS states that the selected alternative will result in "no net increase" in sediment within the Poorman Drainage to avoid jeopardizing the viability of resident bull trout populations.

We are also pleased that additional monitoring information was provided in the FEIS (e.g., three permanent channel cross sections for assessing morphological changes, stream core sampling, BMP inspection reports, etc.). The EPA believes that



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monitoring is necessary to validate and document BMP effectiveness, and to verify that water quality and beneficial uses are protected and restored in the Poorman Drainage. Monitoring information will also be valuable for developing TMDLs for Poorman Creek.

We do recommend expanding the monitoring program to include rapid bioassessments. Monitoring of the aquatic biological community is desirable since the aquatic community integrates the effects of pollutant stressors over time and, thus, provides a more holistic measure of impacts than grab samples of turbidity and suspended sediment.

The EPA believes that relocation and/or closure of the South Fork Poorman Road would most effectively reduce excessive road related sediment deliveries to the South Fork of Poorman Creek (estimated at 60 tons of sediment in 1996). We are pleased, however, that the Forest Service has entered into an agreement with Lewis & Clark County to allow the Forest Service to carry out stabilization work on the South Fork of Poorman Road to reduce erosion problems. Correction of this major sediment source to the Poorman Creek drainage is sorely needed.

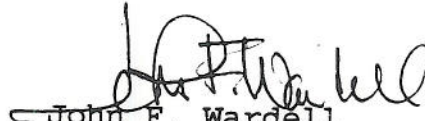
We are also pleased with the inclusion of the Appendix 1- Sediment Reduction Plan in the FEIS, and with proposed stream stabilization and sediment mitigation, including stabilization on a tributary to South Fork of Poorman Creek and on South Fork of Humbug Creek. We also support the elimination of road construction in the Crater Mountain and Nevada Mountain roadless areas.

We remain concerned that there is little discussion of wetlands in the FEIS. The FEIS has insufficient information to determine potential project impacts to wetlands. We are concerned that inadequate attention has been given to identification and assessment of wetlands impacts. We believe that the Forest Service should identify wetlands in the impact areas, describe impacts to wetlands (isolated wetlands as well as riparian wetlands), and explain how impacts, if any occur, will be mitigated (i.e., mitigation means sequence of avoidance, minimization, rehabilitation, and then compensation for unavoidable impacts). We encourage the Forest Service to delineate and mark perennial seeps and springs and wetlands on maps and on the ground before harvesting so that timber contractors will be able to avoid them.

We are pleased with the additional information added to the FEIS to describe potential air quality impacts due to prescribed burning, and presentation of criteria used to approve burning activities. We are also pleased that the ROD explicitly states the Forest Service's desire to avoid burning during the months of December, January, and February, and to limit the amount of prescribed burning during the Spring and Fall seasons.

The EPA appreciates the opportunity to review and comment on the FEIS. If we may provide further explanation of our concerns please contact Mr. Steve Potts of my staff in Helena at (406) 441-1140 ext. 232.

Sincerely,


John F. Wardell
Director
Montana Office

Enclosures

cc: Carol Campbell/Mike Hammer, EPA 8EPR-EP, Denver
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